## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JODI GILL, as Representative and Next Friend of GLENN OSCAR GILL, a Long Term Care Facility Resident, on his behalf and on behalf of

Hon. Chad Kenney

all others Similarly Situated

Case No. 20-cy-02038

and

GREG HUBERT, as Representative and Next Friend of NETHIA KNIGHT, a Long Term Care Facility Resident, on her behalf and on behalf of all others Similarly Situated

Plaintiffs,

VS.

PENNSYLVANIA DEPARTMENT OF HEALTH and RACHEL LEVINE, M.D. In Her Official Capacity as Secretary of Health of the Commonwealth of Pennsylvania

Defendants

PLAINTIFFS' THIRD SUPPLEMENT TO THEIR MOTION FOR PRELIMINARY INJUNCTION

Plaintiffs hereby file the attached documents<sup>1</sup> with reference to their Motion for Preliminary Injunction:

- Plan for Action to Protect Residents of Long-Term Care Facilities
  (Exhibit "X")
- 2. Supplemental Declaration of Larry Brilliant, M.D. (Exhibit "Y")
- 3. Declaration of Jeffrey Shaan, Ph.D. (Exhibit "Z")
- 4. Supplemental Declaration of Kenneth Williams, M.D. (Exhibit "AA")
- 5. Declaration of Jodi Gill (Exhibit "BB")

Respectfully submitted,

## **SHRAGER & SACHS**

BY: /s/ Theresa M. Blanco Robert L. Sachs, Jr., Esquire Theresa M. Blanco, Esquire Co-counsel for Plaintiffs

June 18, 2020

<sup>&</sup>lt;sup>1</sup> Exhibits X, Y, and Z were previously filed but without an exhibit designation. They are included here with the proper exhibit designation (in consecutive fashion aligned with the Motion for Preliminary Injunction) and with page numbers.